

Law Offices of  
**JAMES E. BAHAMONDE, P.C.**

2501 Jody Court  
North Bellmore, NY 11710  
Long Island Tel. (516) 783-9662  
New York City Tel. (646) 290-8258  
Fax No. (646) 435-4376  
James@CivilRightsNY.com


**MEMO ENDORSED**

March 10, 2023

**BY ECF**

Hon. Edgardo Ramos  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1360  
New York, NY 10007

The request for a 14-day extension of time to file an application to reopen (from March 11, 2023, to March 25, 2023) is GRANTED.  
SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: March 12, 2023  
New York, New York

**RE: *Zayas v. 233 Ninth Corp., et al***  
**21cv10170 (ER)(JLC)**

Dear Judge Ramos:

I represent the plaintiff and with the consent of the Defendants, file this joint letter motion seek a 14-day extension of time to file an application to reopen, or in the alternative, to reopen the case. This is the fourth request for an extension of time to reopen.

On February 10, 2023, the Court extended parties time to file an application to reopen by March 11, 2023.

Currently, parties are working cooperatively to find a resolution to this case. However, we've come to some obstacles because of travel of indispensable persons. Consequently, we are asking for a short extension of time so that parties can recommence settlement negotiations once indispensable person returns back from overseas travel. Also, the short extension will help parties keep a leash on the timing our discussions.

Thank you.

Respectfully,

/s/ James E. Bahamonde

James E. Bahamonde, Esq.

cc: (via ECF)  
Sanjay Chaubey, Esq.  
*Attorneys for Defendants*